

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

PAUL MONTANA, GIUSEPPE CUNSOLO,
MILENKO GRACARIO, AKOS MISKEI, and
FRACO CAMPIGOTTO,

Plaintiffs,

-against-

JOHN PAPPAGIORGIO, Individually and d/b/a
GIOVANI VENTI CINQUE, d/b/a JH Pappas
Enterprises, Inc., and SALVATOR "EDGAR"
ZARAZUA, individually, and in his official
capacity as an employee of JOHN
PAPPAGIORGIO,

Defendant.

-----X

VERIFIED ANSWER
TO AMENDED COMPLAINT

Case No. 1:18-CV-6594
(JPO)

Defendant Salvator Zarazua (referred to herein as "Defendant" or "Zarazua"), by his attorney, Ronald A. Goldman, answers the Amended Complaint of Plaintiffs, as follows:

1. Defendant denies knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 1 of the Amended Complaint.
2. Defendant denies knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 2 of the Amended Complaint.
3. Defendant denies knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 3 of the Amended Complaint.
4. Defendant denies knowledge or information sufficient to form a belief as to the allegation set forth in paragraph 4 of the Amended Complaint.
5. Defendant denies knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 6 of the Amended Complaint.
6. Defendant denies knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 6 of the Amended Complaint.

7. Defendant admits the allegations set forth in paragraph 7 of the Amended Complaint.

8. Defendant denies knowledge or information sufficient to form a belief as to the allegations set forth in paragraph 8 of the Amended Complaint.

9. Defendant neither admits nor denies the allegations set forth in paragraph 9 of the Amended Complaint as same merely set forth Plaintiffs' theory of the case. To the extent an answer may be required Defendant denies the allegations in Paragraph 9.

10. Defendant neither admits nor denies the allegations set forth in paragraph 10 of the Amended Complaint as same merely set forth Plaintiffs' theory of the case. To the extent an answer may be required Defendant denies the allegations in Paragraph 10.

11. Defendant neither admits nor denies the allegations set forth in paragraph 11 of the Amended Complaint as same merely set forth Plaintiffs' theory of the case.

12. Defendant neither admits nor denies the allegations set forth in paragraph 12 of the Amended Complaint as same merely set forth Plaintiffs' theory of the case.

13. Defendant denies each and every allegation set forth in paragraph 12 of the Amended Complaint except it is admitted that jurisdiction is properly alleged as to the federal claims; Defendant denies the state court jurisdictional allegations.

13. Defendant denies knowledge and information to form a belief regarding the allegations set forth in paragraph 13 of the Amended Complaint.

14. Defendant denies knowledge and information sufficient to form a belief regarding the allegations set forth in paragraph 14 of the Amended Complaint.

15. Defendant denies knowledge and information sufficient to form a belief regarding the allegations set forth in paragraph 15 of the Amended Complaint.

16. Defendant denies knowledge and information sufficient to form a belief regarding the allegations set forth in paragraph 16 of the Amended Complaint.

17. Defendant denies knowledge and information sufficient to form a belief regarding the allegations set forth in Paragraph 17 of the Amended Complaint.

18. Defendant denies knowledge and information sufficient to form a belief regarding the allegations set forth in Paragraph 18 of the Amended Complaint.

19. Defendant denies each and every allegation set forth in paragraph 19 of the Amended Complaint.

20. Defendant denies the allegations set forth in paragraph 20 of the Amended Complaint.

21. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in Paragraph 21 of the Amended Complaint.

22. Defendant denies the allegation set forth in paragraph 22 of the Amended Complaint.

23. Defendant denies each and every allegation set forth in paragraph 23 of the Amended Complaint.

24. Defendant denies the allegation set forth in paragraph 24 of the Amended Complaint.

25. Defendant denies each and every allegation set forth in paragraph 25 of the Amended Complaint.

26. Defendant denies each and every allegation set forth in paragraph 26 of the Amended Complaint.

27. Defendant denies each and every allegation set forth in paragraph 27 of the Amended Complaint.

28. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 28 of the Amended Complaint.

29. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 29 of the Amended Complaint.

30. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 30 of the Amended Complaint.

31. Defendant denies each and every allegation set forth in paragraph 31 of the Amended Complaint.

32. Defendant denies each and every allegation set forth in paragraph 32 of the Amended Complaint.

33. Defendant denies each and every allegation set forth in paragraph 33 of the Amended Complaint.

34. Defendant denies each and every allegation set forth in paragraph 34 of the Amended Complaint.

35. Defendant denies each and every allegation set forth in paragraph 35 of the Amended Complaint.

36. Defendant denies each and every allegation set forth in paragraph 36 of the Amended Complaint.

37. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 37 of the Amended Complaint.

38. Defendant denies each and every allegation set forth in paragraph 38 of the Amended Complaint.

39. Defendant denies each and every allegation set forth in paragraph 39 of the Amended Complaint.

40. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 40 of the Amended Complaint.

41. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 41 of the Amended Complaint.

42. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 42 of the Amended Complaint.

43. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 43 of the Amended Complaint.

44. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 44 of the Amended Complaint.

45. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 45 of the Amended Complaint.

46. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 46 of the Amended Complaint.

47. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 47 of the Amended Complaint.

48. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 48 of the Amended Complaint.

49. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 49 of the Amended Complaint.

50. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 50 of the Amended Complaint.

51. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 51 of the Amended Complaint.

52. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 52 of the Amended Complaint.

53. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 53 of the Amended Complaint.

54. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 54 of the Amended Complaint.

55. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 55 of the Amended Complaint.

56. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 56 of the Amended Complaint.

57. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 57 of the Amended Complaint.

58. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 58 of the Amended Complaint.

59. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 59 of the Amended Complaint.

60. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 60 of the Amended Complaint.

61. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 61 of the Amended Complaint.

62. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 62 of the Amended Complaint.

63. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 62 of the Amended Complaint.

64. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 64 of the Amended Complaint.

65. Defendant denies each and every allegation set forth in paragraph 65 of the Amended Complaint.

66. Defendant denies each and every allegation set forth in paragraph 66 of the Amended Complaint.

67. Defendant denies each and every allegation set forth in paragraph 67 of the Amended Complaint.

68. Defendant admits the allegations set forth in paragraph 68 of the Amended Complaint.

69. Defendant denies each and every allegation set forth in paragraph 69 of the Amended Complaint.

70. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 70 of the Amended Complaint.

71. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 71 of the Amended Complaint.

72. Defendant denies knowledge and information sufficient to form a belief regarding the allegations contained in paragraph 72 of the Amended Complaint.

73. Defendant denies each and every allegation set forth in paragraph 73 of the Amended Complaint.

74. Defendant denies each and every allegation set forth in paragraph 74 of the Amended Complaint.

75. Defendant denies each and every allegation set forth in paragraph 75 of the Amended Complaint.

76. Defendant denies each and every allegation set forth in paragraph 76 of the Amended Complaint.

77. Defendant denies each and every allegation set forth in paragraph 77 of the Amended Complaint.

78. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 78 of the Amended Complaint.

79. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 79 of the Amended Complaint.

80. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 80 of the Amended Complaint.

81. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 81 of the Amended Complaint.

82. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 82 of the Amended Complaint.

83. Defendant denies each and every allegation set forth in paragraph 83 of the Amended Complaint.

84. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 84 of the Amended Complaint.

85. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 85 of the Amended Complaint.

86. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 86 of the Amended Complaint.

87. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 87 of the Amended Complaint.

88. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 88 of the Amended Complaint.

89. Defendant denies each and every allegation set forth in paragraph 89 of the Amended Complaint.

90. Defendant denies each and every allegation set forth in paragraph 90 of the Amended Complaint.

91. Defendant denies each and every allegation set forth in paragraph 91 of the Amended Complaint.

92. Defendant denies each and every allegation set forth in paragraph 92 of the Amended Complaint.

93. Defendant denies each and every allegation set forth in paragraph 93 of the Amended Complaint.

94. Defendant denies each and every allegation set forth in paragraph 94 of the Amended Complaint.

95. Defendant denies each and every allegation set forth in paragraph 95 of the Amended Complaint.

96. Defendant denies each and every allegation set forth in paragraph 96 of the Amended Complaint.

97. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 97 of the Amended Complaint.

98. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 98 of the Amended Complaint.

99. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 99 of the Amended Complaint.

100. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 100 of the Amended Complaint.

101. Defendant denies each and every allegation set forth in paragraph 101 of the Amended Complaint.

102. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 102 of the Amended Complaint.

103. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 103 of the Amended Complaint.

104. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 104 of the Amended Complaint.

105. Defendant denies each and every allegation set forth in paragraph 105 of the Amended Complaint.

106. Defendant denies each and every allegation set forth in paragraph 106 of the Amended Complaint.

107. Defendant denies each and every allegation set forth in paragraph 107 of the Amended Complaint.

108. Defendant denies each and every allegation set forth in paragraph 108 of the Amended Complaint.

109. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 109 of the Amended Complaint.

110. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 110 of the Amended Complaint.

111. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 111 of the Amended Complaint.

112. Defendant denies each and every allegation set forth in paragraph 112 of the Amended Complaint.

113. Defendant denies each and every allegation set forth in paragraph 113 of the Amended Complaint.

114. Defendant denies each and every allegation set forth in paragraph 114 of the Amended Complaint.

115. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 115 of the Amended Complaint.

116. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 116 of the Amended Complaint.

117. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 117 of the Amended Complaint.

118. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 118 of the Amended Complaint.

119. Defendant denies each and every allegation set forth in paragraph 119 of the Amended Complaint.

120. Defendant denies each and every allegation set forth in paragraph 120 of the Amended Complaint.

121. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 121 of the Amended Complaint.

122. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 122 of the Amended Complaint.

123. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 123 of the Amended Complaint.

124. Defendant denies each and every allegation set forth in paragraph 124 of the Amended Complaint.

125. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 125 of the Amended Complaint.

126. Defendant denies knowledge and information sufficient to form a belief as to the

allegations set forth in paragraph 126 of the Amended Complaint.

127. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 127 of the Amended Complaint.

128. Defendant denies each and every allegation set forth in paragraph 128 of the Amended Complaint.

129. Defendant denies each and every allegation set forth in paragraph 129 of the Amended Complaint.

130. Defendant denies each and every allegation set forth in paragraph 130 of the Amended Complaint.

131. Defendant denies each and every allegation set forth in paragraph 131 of the Amended Complaint.

132. Defendant denies each and every allegation set forth in paragraph 132 of the Amended Complaint.

133. Defendant denies each and every allegation set forth in paragraph 133 of the Amended Complaint.

134. Defendant denies each and every allegation set forth in paragraph 134 of the Amended Complaint.

135. Defendant denies each and every allegation set forth in paragraph 135 of the Amended Complaint.

136. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 136 of the Amended Complaint.

137. Defendant denies each and every allegation set forth in paragraph 137 of the Amended Complaint.

138. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 138 of the Amended Complaint.

139. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 139 of the Amended Complaint.

140. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 140 of the Amended Complaint.

141. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 141 of the Amended Complaint.

142. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 142 of the Amended Complaint.

143. Defendant denies each and every allegation set forth in paragraph 143 of the Amended Complaint.

144. Defendant denies each and every allegation set forth in paragraph 144 of the Amended Complaint.

145. Defendant denies each and every allegation set forth in paragraph 145 of the Amended Complaint.

146. Defendant denies each and every allegation set forth in paragraph 146 of the Amended Complaint.

147. Defendant denies each and every allegation set forth in paragraph 147 of the Amended Complaint.

148. Defendant denies knowledge and information sufficient to form a belief as to the allegations set forth in paragraph 148 of the Amended Complaint.

149. Defendant denies each and every allegation set forth in paragraph 149 of the Amended Complaint.

AS AND FOR A FIRST CAUSE OF ACTION

150. Defendant admits and denies the allegations set forth in paragraph 150 of the Amended Complaint to the extent previously admitted or denied.

151. Defendant denies each and every allegation set forth in paragraph 151 of the Amended Complaint.

152. Defendant denies each and every allegation set forth in paragraph 152 of the Amended Complaint.

153. Defendant denies each and every allegation set forth in paragraph 153 of the Amended Complaint.

AS AND FOR A SECOND CAUSE OF ACTION

154. Defendant admits and denies the allegations set forth in paragraph 154 of the Amended Complaint to the extent previously admitted or denied.

155. Defendant denies each and every allegation set forth in paragraph 155 of the Amended Complaint.

156. Defendant denies each and every allegation set forth in paragraph 156 of the Amended Complaint.

157. Defendant denies each and every allegation set forth in paragraph 157 of the Amended Complaint.

158. Defendant denies each and every allegation set forth in paragraph 158 of the Amended Complaint.

AS AND FOR A THIRD CAUSE OF ACTION

159. Defendant admits and denies the allegations set forth in paragraph 159 of the Amended Complaint to the extent previously admitted or denied.

160. Defendant denies each and every allegation set forth in paragraph 160 of the Amended Complaint.

161. Defendant denies each and every allegation set forth in paragraph 161 of the Amended Complaint.

162. Defendant denies each and every allegation set forth in paragraph 162 of the Amended Complaint.

163. Defendant denies each and every allegation set forth in paragraph 163 of the Amended Complaint.

164. Defendant denies each and every allegation set forth in paragraph 164 of the Amended Complaint.

165. Defendant denies each and every allegation set forth in paragraph 165 of the Amended Complaint.

166. Defendant denies each and every allegation set forth in paragraph 166 of the Amended Complaint.

167. Defendant denies each and every allegation set forth in paragraph 167 of the Amended Complaint.

168. Defendant denies each and every allegation set forth in paragraph 168 of the Amended Complaint.

AS FOR A FOURTH CAUSE OF ACTION

169. Defendant admits and denies the allegations set forth in paragraph 169 of the Amended Complaint to the extent previously admitted or denied.

170. Defendant denies each and every allegation set forth in paragraph 170 of the Amended Complaint.

171. Defendant denies each and every allegation set forth in paragraph 171 of the Amended Complaint.

172. Defendant denies each and every allegation set forth in paragraph 172 of the Amended Complaint.

173. Defendant denies each and every allegation set forth in paragraph 173 of the Amended Complaint.

174. Defendant denies each and every allegation set forth in paragraph 174 of the Amended Complaint.

175. Defendant denies each and every allegation set forth in paragraph 175 of the Amended Complaint.

176. Defendant denies each and every allegation set forth in paragraph 176 of the Amended Complaint.

177. Defendant denies each and every allegation set forth in paragraph 177 of the Amended Complaint.

178. Defendant denies each and every allegation set forth in paragraph 178 of the Amended Complaint.

AS FOR A FIFTH CAUSE OF ACTION

179. Defendant admits and denies the allegations set forth in paragraph 179 of the Amended Complaint to the extent previously admitted or denied.

180. Defendant denies each and every allegation set forth in paragraph 180 of the Amended Complaint.

181. Defendant denies each and every allegation set forth in paragraph 181 of the Amended Complaint.

182. Defendant denies each and every allegation set forth in paragraph 182 of the Amended Complaint.

183. Defendant denies each and every allegation set forth in paragraph 183 of the Amended Complaint.

184. Defendant denies each and every allegation set forth in paragraph 184 of the Amended Complaint.

185. Defendant denies each and every allegation set forth in paragraph 185 of the Amended Complaint.

186. Defendant denies each and every allegation set forth in paragraph 186 of the Amended Complaint.

187. Defendant denies each and every allegation set forth in paragraph 187 of the Amended Complaint.

188. Defendant denies each and every allegation set forth in paragraph 188 of the Amended Complaint.

AS AND FOR A SIXTH CAUSE OF ACTION

189. Defendant admits and denies the allegations set forth in paragraph 189 of the Amended Complaint to the extent previously admitted or denied.

190. Defendant denies each and every allegation set forth in paragraph 190 of the Amended Complaint.

191. Defendant denies each and every allegation set forth in paragraph 191 of the Amended Complaint.

192. Defendant denies each and every allegation set forth in paragraph 192 of the Amended Complaint.

193. Defendant denies each and every allegation set forth in paragraph 193 of the Amended Complaint.

194. Defendant denies each and every allegation set forth in paragraph 194 of the Amended Complaint.

195. Defendant denies each and every allegation set forth in paragraph 195 of the Amended Complaint.

AS FOR THE SEVENTH CAUSE OF ACTION

196. Defendant admits and denies the allegations set forth in paragraph 196 of the Amended Complaint to the extent previously admitted or denied.

197. Defendant denies each and every allegation set forth in paragraph 197 of the Amended Complaint.

198. Defendant denies each and every allegation set forth in paragraph 198 of the Amended Complaint.

199. Defendant denies each and every allegation set forth in paragraph 199 of the Amended Complaint.

200. Defendant denies each and every allegation set forth in paragraph 200 of the Amended Complaint.

201. Defendant denies each and every allegation set forth in paragraph 201 of the Amended Complaint.

202. Defendant denies each and every allegation set forth in paragraph 202 of the Amended Complaint.

203. Defendant denies each and every allegation set forth in paragraph 203 of the Amended Complaint.

204. Defendant denies each and every allegation set forth in paragraph 204 of the Amended Complaint.

205. Defendant denies each and every allegation set forth in paragraph 205 of the Amended Complaint.

AS AND FOR AN EIGHTH CAUSE OF ACTION

206. Defendant admit and denies the allegations set forth in paragraph 206 of the Amended Complaint to the extent previously admitted or denied.

207. Defendant denies each and every allegation set forth in paragraph 207 of the Amended Complaint.

208. Defendant denies each and every allegation set forth in paragraph 208 of the Amended Complaint.

209. Defendant denies each and every allegation set forth in paragraph 209 of the Amended Complaint.

210. Defendant denies each and every allegation set forth in paragraph 210 of the Amended Complaint.

211. Defendant denies each and every allegation set forth in paragraph 211 of the Amended Complaint.

212. Defendant denies each and every allegation set forth in paragraph 212 of the Amended Complaint.

AS AND FOR A NINTH CAUSE OF ACTION

213. Defendant admit and denies the allegations set forth in paragraph 213 of the Amended Complaint to the extent previously admitted or denied.

214. Defendant denies each and every allegation set forth in paragraph 214 of the Amended Complaint.

215. Defendant denies each and every allegation set forth in paragraph 215 of the Amended Complaint.

216. Defendant denies each and every allegation set forth in paragraph 216 of the Amended Complaint.

217. Defendant denies each and every allegation set forth in paragraph 217 of the Amended Complaint.

218. Defendant denies each and every allegation set forth in paragraph 218 of the Amended Complaint.

219. Defendant denies each and every allegation set forth in paragraph 219 of the Amended Complaint.

220. Defendant denies each and every allegation set forth in paragraph 220 of the Amended Complaint.

221. Defendant denies each and every allegation set forth in paragraph 221 of the Amended Complaint.

222. Defendant denies each and every allegation set forth in paragraph 222 of the Amended Complaint.

AS AND FOR A TENTH CAUSE OF ACTION

223. Defendant admits and denies the allegations set forth in paragraph 223 of the Amended Complaint to the extent previously admitted or denied.

224. Defendant denies each and every allegation set forth in paragraph 224 of the Amended Complaint.

225. Defendant denies each and every allegation set forth in paragraph 225 of the Amended Complaint.

226. Defendant denies each and every allegation set forth in paragraph 226 of the Amended Complaint.

227. Defendant denies each and every allegation set forth in paragraph 227 of the Amended Complaint.

228. Defendant denies each and every allegation set forth in paragraph 228 of the Amended Complaint.

229. Defendant denies each and every allegation set forth in paragraph 229 of the Amended Complaint.

AS AND FOR A ELEVENTH CAUSE OF ACTION

230. Defendant admits and denies the allegations set forth in paragraph 230 of the Amended Complaint to the extent previously admitted or denied.

231. Defendant denies each and every allegation set forth in paragraph 231 of the Amended Complaint.

232. Defendant denies each and every allegation set forth in paragraph 232 of the Amended Complaint.

233. Defendant denies each and every allegation set forth in paragraph 233 of the Amended Complaint.

234. Defendant denies each and every allegation set forth in paragraph 234 of the Amended Complaint.

AS AND FOR A TWELFTH A CAUSE OF ACTION

235. Defendant admits and denies the allegations set forth in paragraph 235 of the Amended Complaint to the extent previously admitted or denied.

236. Defendant denies each and every allegation set forth in paragraph 236 of the Amended Complaint.

237. Defendant denies each and every allegation set forth in paragraph 237 of the Amended Complaint.

238. Defendant denies each and every allegation set forth in paragraph 238 of the Amended Complaint.

239. Defendant denies each and every allegation set forth in paragraph 239 of the Amended Complaint.

240. Defendant denies each and every allegation set forth in paragraph 240 of the Amended Complaint.

241. Defendant denies each and every allegation set forth in paragraph 241 of the Amended Complaint.

242. Defendant denies each and every allegation set forth in paragraph 242 of the Amended Complaint.

243. Defendant denies each and every allegation set forth in paragraph 243 of the Amended Complaint.

244. Defendant denies each and every allegation set forth in paragraph 244 of the Amended Complaint.

245. Defendant denies each and every allegation set forth in paragraph 245 of the Amended Complaint.

246. Defendant denies each and every allegation set forth in paragraph 246 of the Amended Complaint.

247. Defendant denies each and every allegation set forth in paragraph 247 of the Amended Complaint.

248. Defendant denies each and every allegation set forth in paragraph 248 of the Amended Complaint.

249. Defendant denies each and every allegation set forth in paragraph 249 of the Amended Complaint.

250. Defendant denies each and every allegation set forth in paragraph 250 of the Amended Complaint.

251. Defendant denies each and every allegation set forth in paragraph 251 of the Amended Complaint.

252. Defendant denies each and every allegation set forth in paragraph 252 of the Amended Complaint.

253. Defendant denies each and every allegation set forth in paragraph 253 of the Amended Complaint.

254. Defendant denies each and every allegation set forth in paragraph 254 of the Amended Complaint.

255. Defendant denies each and every allegation set forth in paragraph 255 of the Amended Complaint.

256. Defendant denies each and every allegation set forth in paragraph 256 of the Amended Complaint.

257. Defendant denies each and every allegation set forth in paragraph 257 of the Amended Complaint.

258. Defendant denies each and every allegation set forth in paragraph 258 of the Amended Complaint.

259. Defendant denies each and every allegation set forth in paragraph 259 of the Amended Complaint.

260. Defendant denies each and every allegation set forth in paragraph 260 of the Amended Complaint.

261. Defendant denies each and every allegation set forth in paragraph 261 of the Amended Complaint.

262. Defendant denies each and every allegation set forth in paragraph 262 of the Amended Complaint.

263. Defendant denies each and every allegation set forth in paragraph 263 of the Amended Complaint.

64. Defendant denies each and every allegation set forth in paragraph 264 of the Amended Complaint.

265. Defendant denies each and every allegation set forth in paragraph 265 of the Amended Complaint.

266. Defendant denies each and every allegation set forth in paragraph 266 of the Amended Complaint.

267. Defendant denies each and every allegation set forth in paragraph 267 of the Amended Complaint.

268. Defendant denies each and every allegation set forth in paragraph 268 of the Amended Complaint.

269. Defendant denies each and every allegation set forth in paragraph 269 of the Amended Complaint.

270. Defendant denies each and every allegation set forth in paragraph 270 of the Amended Complaint.

271. Defendant denies each and every allegation set forth in paragraph 271 of the Amended Complaint.

272. Defendant denies each and every allegation set forth in paragraph 272 of the Amended Complaint.

273. Defendant denies each and every allegation set forth in paragraph 273 of the Amended Complaint.

274. Defendant denies each and every allegation set forth in paragraph 274 of the Amended Complaint.

275. Defendant denies each and every allegation set forth in paragraph 275 of the Amended Complaint.

276. Defendant denies each and every allegation set forth in paragraph 276 of the Amended Complaint.

277. Defendant denies each and every allegation set forth in paragraph 277 of the Amended Complaint.

278. Defendant denies each and every allegation set forth in paragraph 278 of the Amended Complaint.

279. Defendant denies each and every allegation set forth in paragraph 279 of the Amended Complaint.

280. Defendant denies each and every allegation set forth in paragraph 280 of the Amended Complaint.

281. Defendant denies each and every allegation set forth in paragraph 281 of the Amended Complaint.

AS AND FOR A THIRTEENTH CAUSE OF ACTION

282. Defendant admits and denies the allegations set forth in paragraph 282 of the Amended Complaint to the extent previously admitted or denied.

283. Defendant denies each and every allegation set forth in paragraph 283 of the Amended Complaint.

284. Defendant denies each and every allegation set forth in paragraph 284 of the Amended Complaint.

285. Defendant denies each and every allegation set forth in paragraph 285 of the Amended Complaint.

286. Defendant denies each and every allegation set forth in paragraph 286 of the Amended Complaint.

287. Defendant denies each and every allegation set forth in paragraph 287 of the Amended Complaint.

288. Defendant denies each and every allegation set forth in paragraph 288 of the Amended Complaint.

289. Defendant denies each and every allegation set forth in paragraph 289 of the Amended Complaint.

AS AND FOR A FOURTEENTH CAUSE OF ACTION

290. Defendant admits and denies the allegations set forth in paragraph 290 of the Amended Complaint to the extent previously admitted or denied.

291. Defendant denies each and every allegation set forth in paragraph 291 of the Amended Complaint.

292. Defendant denies each and every allegation set forth in paragraph 292 of the Amended Complaint.

AS AND FOR A FIFTEENTH CAUSE OF ACTION

293. Defendant admits and denies the allegations set forth in paragraph 293 of the Amended Complaint to the extent previously admitted or denied.

294. Defendant denies each and every allegation set forth in paragraph 294 of the Amended Complaint.

295. Defendant denies each and every allegation set forth in paragraph 295 of the Amended Complaint.

296. Defendant denies each and every allegation set forth in paragraph 296 of the Amended Complaint.

AS AND FOR A SIXTEENTH CAUSE OF ACTION

297. Defendant admits and denies the allegations set forth in paragraph 297 of the Amended Complaint to the extent previously admitted or denied.

298. Defendant denies each and every allegation set forth in paragraph 298 of the Amended Complaint.

299. Defendant denies each and every allegation set forth in paragraph 299 of the Amended Complaint.

300. Defendant denies each and every allegation set forth in paragraph 300 of the Amended Complaint.

301. Defendant denies each and every allegation set forth in paragraph 301 of the Amended Complaint.

302. Defendant denies each and every allegation set forth in paragraph 302 of the Amended Complaint.

303. Defendant denies each and every allegation set forth in paragraph 303 of the Amended Complaint.

304. Defendant denies each and every allegation set forth in paragraph 304 of the Amended Complaint.

AS AND FOR THE FIRST AFFIRMATIVE DEFENSE

305. Plaintiffs have failed to allege a cause of action upon which relief may be granted.

AS AND FOR THE SECOND AFFIRMATIVE DEFENSE

306. All claims for relief beyond the applicable statutes of limitations are barred.

AS AND FOR A THIRD AFFIRMATIVE DEFENSE

307. The action is barred by the doctrine of laches.

AS AND FOR A FORTH AFFIRMATIVE DEFENSE

308. The damages alleged in this action by Plaintiffs, including, but not limited to damages asserted on the allegations of a sexually hostile workplace, if any, were in fact sustained and were caused by the acts and omission of others, including each of the Plaintiffs, for which Defendant has no legal responsibility or culpability.

AS AND FOR A FIFTH AFFIRMATIVE DEFENSE

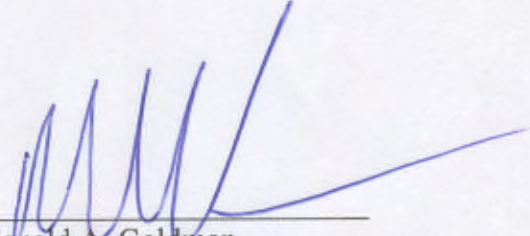
319. This action is barred, in whole or in part, as a result of the Plaintiffs' respective own wrongful and dilatory conduct and their own inactions.

AS AND FOR A SIXTH AFFIRMATIVE DEFENSE

323. Defendant reserve the right to raise additional affirmative defense and to supplement those asserted herein upon discovery of further information and investigation into Plaintiffs' claims. These additional defenses cannot be articulated at this time due to Plaintiffs' failure to properly describe her claims with sufficient particularity in the Amended Complaint.

WHEREFORE, Defendant demands judgment dismissing Amended Complaint, with prejudice, and awarding Defendant attorney's fees, costs and disbursements of this action, and such other and further relief as this Honorable Court deems just and proper.

Dated: October 23, 2018
Brooklyn, NY



Ronald A. Goldman
Attorney for Salvator Zarazua
140 Remsen Street – Suite One
Brooklyn, NY 11201
(718) 490-9628
ragoldma61@gmail.com

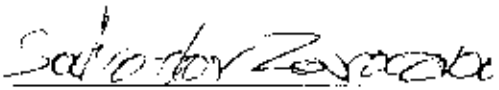
VERIFICATION

STATE OF NEW YORK)

ss:

COUNTY OF KINGS)

Salvator Zarazua being duly sworn, deposes and says that I am a defendant in this action that I have read the foregoing answer to the Verified Amended Complaint and I know the contents thereof, and the same are true to my knowledge, information and belief.


Salvator Zarazua

Sworn before me this
23rd day of October, 2018


NOTARY PUBLIC

RAYMOND F. SCHULTZ
Notary Public, State of New York
No. 01SC4774543
Qualified in Queens County
Commission Expires Oct. 31, 2018